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March 11, 2019

Joshua Wayland
Surface Transportation Board
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RE: Draft Environmental Assessment; Surface Transportation Board Docket No. FD 36186-Texas Railway Exchange-Construction and Operation Exemption; Galveston, Galveston County, Texas

Dear Mr. Wayland:

Texas Parks and Wildlife Department (TPWD) has received and reviewed the Draft Environmental Assessment (Draft EA) regarding the above-referenced proposed railway line project.

Please be aware that a written response to a TPWD recommendation or informational comment received by a state governmental agency may be required by state law. For further guidance, see the Texas Parks and Wildlife Code, Section 12.0011. For tracking purposes, please refer to TPWD project number 41530 in any return correspondence regarding this project.

Project Description

Texas Railway Exchange LLC (TREX) proposes to construct and operate approximately 2,800 feet of new rail line in the City of Galveston, Galveston County, Texas. Based on projected rail traffic provided by TREX, it is estimated that on average, a total of approximately four trains would operate on the proposed rail line per week including both incoming and outgoing trains. The project is not anticipated to create an increase in total rail traffic.

The project footprint is located south of the Galveston Ship Channel and southwest of the Port of Galveston in an industrial area that includes several rail lines, rail yards, and a number of port facilities, including the Terminal. The proposed rail line would extend approximately 2,800 feet in a southwesterly direction from the southern edge of the existing terminal property and would cross an existing Union Pacific (UP) rail line south of the terminal to connect to the existing BNSF tracks. The proposed rail line would cross Port Industrial Road and would travel under elevated portions of SH 275/Harborside Drive and the 51st Street/Pelican Island Causeway. It would also cross two ditches and two emergent wetlands considered as jurisdictional water and wetland features under Section 404 of the Clean Water Act.

The entire length of the proposed rail line would involve new construction. The rail right-of-way (ROW) would be approximately 2,800 feet long and 50 feet wide, including approximately 25 feet on either side of the centerline of the new rail line. A gravel crew access road would be constructed within the proposed ROW parallel to the northern side of the new track. The crew access road would be constructed between the existing crew

change parking area near the west end of the proposed project and the existing crew access road south of the Port Industrial Road. Grading and surface preparation could occur during construction. New sub-ballast, ballast, ties, rail, and switch components would be installed within the ROW. A new at-grade road crossing would be installed where the proposed rail line would cross Port Industrial Road between 356 feet and 660 feet west of the existing TREX rail line crossing, depending on the Build Alternative selected. The proposed rail line would also cross two tidal waterways and two wetland areas, which could require the placement of fill materials and culvert structures in those habitats.

Environmental Impacts

Two alternatives (Green and Blue Alternatives), and two potential design options (Option A and Option B) for each of these alternatives, as well as the No-Action Alternative were considered in the Draft EA for determining the least environmental impact by the project. Although the wetland acreage was provided for each of these alternatives, the applicant has not provided a habitat assessment of these wetlands in terms of functional capacity units (FCUs) using the U.S. Army Corps of Engineers (USACE) Galveston District's interim hydrogeomorphic (iHGM) model for tidal emergent wetlands. Likewise, no figures were provided in the Draft EA that display wetlands or waters within the project area. The applicant also has not provided a compensatory mitigation plan for the proposed palustrine emergent wetlands impacts.

Based upon review of the Draft EA it does not appear that impacts beyond the ROW, such as temporary laydown areas, were defined or assessed.

Recommendations: The applicant should provide a habitat assessment of wetlands in the project area which uses the USACE Galveston District's iHGM model for tidal emergent wetlands, provide figures of wetlands in the project area, and clarify impacts anticipated to occur both within and outside of the ROW. The location and nature (e.g. temporary impact from laydown area, permanent impact from crew road) of all impacts should be defined as clearly as possible within the EA. A mitigation plan that addresses all wetland impacts associated with the project should be developed and provided in the EA.

Proposed Alternatives

Green Alternative

This alternative would extend approximately 2,800 feet in a southwesterly direction from the southern end of the existing terminal property to the existing BNSF unit train stacking tracks lying south of an existing UP rail line. From its northeastern terminus at the Terminal, the Green Alternative would cross Port Industrial Road at-grade and would travel under the 51st Street/Pelican Island Causeway. It would then cross a tidal water feature and two emergent wetlands and travel under SH 275/Harborside Drive. The Green Alternative would cross the existing UP rail line at-grade and cross a linear ditch (a second tidal water feature) south of the UP tracks before terminating at a connection with the BNSF tracks on

the south side of the ditch. The Green Alternative includes construction of a new crew access road north of and parallel to the new track from the crossing under SH 275/Harborside Drive to the existing crew parking area north of the UP tracks near the proposed rail line's western terminus. The Green Alternative would require the construction of a new culvert and the extension of an existing culvert to cross two tidal water features, resulting in impacts to 0.415 acres of tidal wetlands and waterways.

Blue Alternative

The Blue Alternative would have the same terminus points as the Green Alternative and would follow similar alignments. The Blue Alternative avoids crossing the tidal water and both emergent wetlands to the west of 51st Street/Pelican Island Causeway by veering farther south into UP property to parallel the existing UP rail line. However, the Blue Alternative would require installation of a new culvert to cross the linear ditch south of the UP tracks before terminating at a connection with the BNSF tracks on the south side of the ditch. The installation of this culvert would impact 0.099 acre of tidal wetlands and waterways. Similar to the Green Alternative, the Blue Alternative would also include a new crew access road.

TPWD offers the following comments and recommendations concerning this project.

TPWD's Recommended Least Damaging Environmental Alternative

Recommendations: The applicant should:

- Minimize impacts to tidal wetlands and waterways by considering the proposed Blue Alternative as the least environmentally damaging alternative. As noted in the Draft EA, such features serve as habitat for protected species and other wildlife.
- Provide a habitat assessment of the tidal wetlands impacted by the proposed project by determining their biological, physical and chemical FCUs using the Galveston District's iHGM model for tidal emergent wetlands.
- Provide a compensatory mitigation plan for the proposed tidal emergent wetland impacts by developing a permittee responsible mitigation plan that contains all the required components identified under 33 CFR 332(c)(2) through (c)(14) in Compensatory Mitigation for Loss of Aquatic Resources (73 Federal Register 19596, April 10, 2008).

Construction Recommendations

General Construction Recommendations

Recommendation: TPWD recommends the judicious use and placement of sediment control fence to exclude wildlife from the construction area. In many cases, sediment control fence placement for the purposes of controlling erosion and protecting water quality can be modified minimally to also provide the benefit of excluding wildlife access to construction areas. The exclusion fence should be buried at least six inches

and be at least 24 inches high. The exclusion fence should be maintained for the life of the project and only removed after the construction is completed and the disturbed site has been revegetated. Construction personnel should be encouraged to examine the inside of the exclusion area daily to determine if any wildlife species have been trapped inside the area of impact and provide safe egress opportunities prior to initiation of construction activities.

Recommendation: For soil stabilization and/or revegetation of disturbed areas within the proposed project area, TPWD recommends erosion and seed/mulch stabilization materials that avoid entanglement hazards to snakes and other wildlife species. Because the mesh found in many erosion control blankets or mats pose an entanglement hazard to wildlife, TPWD recommends the use of no-till drilling, hydromulching and/or hydroseeding rather than erosion control blankets or mats due to a reduced risk to wildlife. If erosion control blankets or mats will be used, the product should contain no netting or contain loosely woven, natural fiber netting in which the mesh design allows the threads to move, therefore allowing expansion of the mesh openings. Plastic mesh matting should be avoided.

Recommendation: If trenching or other excavation is involved in construction, TPWD recommends that contractors keep trenching/excavation and backfilling crews close together to minimize the amount of trenches/excavation areas left open at any given time during construction. TPWD recommends that any open trenches or excavation areas be covered overnight and/or inspected every morning to ensure no reptiles or other wildlife species have been trapped. Trenches left open for more than two daylight hours should be inspected for the presence of trapped wildlife prior to backfilling. If trenches/excavation areas cannot be backfilled the day of initial excavation, then escape ramps should be installed at least every 90 meters. Escape ramps can be short lateral trenches or wooden planks sloping to the surface at an angle less than 45 degrees (1:1).

Culverts

Crossings should be constructed in a manner that does not impede flow, over-widen the channel, or destabilize the banks. Natural bed and banks are significant features for fish and wildlife. Box culverts eliminate access to water for many animal species and act as a barrier to the passage of aquatic organisms. Additionally, many animals burrow into banks for nesting or roosting. Natural shorelines and banks allow access both into and out of the water, or just to the water's edge for many animals, such as salamanders, turtles, snakes, invertebrates, and birds.

Long culverts particularly pose a barrier to animal crossing. The wide, flat bottom of a square culvert spreads out the flow, creating a shallower water depth which also may prevent passage of aquatic organisms. Culverts accelerate water velocity at elevated flows, increasing downstream erosion and further inhibiting aquatic organism passage. Culverts require erosion prevention structures at the culvert outfalls. Lack of protection will likely lead to stream down-cutting and the creation of an impediment to passage for aquatic

organisms.

Recommendation: The applicant should minimize the impacts of installing a culvert in tidal wetlands by using an open bottom single culvert and/or more technically advanced design features in order to allow a more natural environment for aquatic organisms to migrate through this passageway. The size and shape of the culvert should be used to maintain the approximate configuration of the bankfull channel for water and sediment transport; or use smaller culverts set at higher elevations to maintain the integrity of the floodplain.

Federal Law: Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) prohibits direct and affirmative purposeful action that reduce migratory birds, their eggs, or their nests, by killing or capturing, to human control, except when specifically authorized by the Department of the Interior. This protection applies to most native bird species, including ground nesting species. The U.S. Fish and Wildlife Service (USFWS) Migratory Bird Office can be contacted at (505) 248-7882 for more information on potential impacts to migratory birds.

The Draft EA, mitigation measure (MM) 17, notes a commitment to:

- Deal with migratory bird species in a manner consistent with the Migratory Bird Treaty Act (MBTA);
- Conduct surveys of the project footprint for migratory birds prior to construction; and
- Leave an area of buffer vegetation around any observed nests no less than 15 feet in all directions until the young have fledged.

Recommendation: TPWD recommends any vegetation clearing be scheduled outside of the general bird nesting season of March 15th to September 15th; however, if clearing must occur during nesting season, nest surveys should be conducted prior to clearing. Nest surveys should be conducted no more than 5 days prior to construction in order to maximize detection of active nests. If nests are observed during surveys, a vegetation buffer area of no less than 150-feet in diameter should remain around the nest until all young have fledged.

Comment: TPWD does not consider a 15-foot buffer of vegetation to be sufficient in width to protect migratory bird nests/young.

Federal Law: Endangered Species Act

Federally listed animal species and their habitat are protected from take on any property by the Endangered Species Act (ESA). Take of a federally listed species can be allowed if it is incidental to an otherwise lawful activity and must be permitted in accordance with Section 7 or 10 of the ESA. Any take of a federally listed species or its habitat without the required take permit (or allowance) from the USFWS is a violation of the ESA.

The USFWS should be contacted for species occurrence data, guidance, permitting, survey protocols, and mitigation for federally listed species. For the USFWS rare species lists by county, please visit the USFWS Information for Planning and Consultation (IPaC) webpage.

The Draft EA does acknowledge potential habitat for federally-listed species as occurring within the project area. MM-20 includes commitments to notify TPWD or the U.S. Fish and Wildlife Service if any federally or state listed threatened or endangered species are encountered during construction.

The study area may provide habitat for multiple federally listed or candidate species. These include:

- eastern black rail (*Laterallus jamaicensis*, proposed threatened as of October 9, 2018)
- red knot (*Calidris canutus rufa*, threatened)

The red knot is a species which could be present within the study area during migration. The eastern black rail is a resident species that could occur within the study area in areas of suitable habitat

Recommendation: TPWD recommends a policy of coordination with USFWS if either of the above-listed bird species are observed in the area of the project.

Recommendation: TPWD recommends avoiding disturbance to the wetland habitats required by the above-named species. If disturbance is anticipated, TPWD recommends a qualified biologist conduct pre-construction surveys for these species. TPWD recommends that if any of these species or their habitat would be impacted by the proposed project, TREX should coordinate with TPWD and the USFWS, as appropriate, to determine avoidance, minimization, and mitigation strategies. For coordination with TPWD regarding terrestrial habitat impacts, please contact Ms. Rachel Lange at (361) 412-9012 or Rachel.Lange@tpwd.texas.gov. For coordination with TPWD regarding aquatic habitat impacts, please contact Ms. Colleen Roco at (281) 534-0139 or Colleen.Roco@tpwd.texas.gov.

Federal Law: Clean Water Act

Section 404 of the Clean Water Act (CWA) establishes a federal program to regulate the discharge of dredged and fill material into the waters of the U.S., including wetlands. The USACE and the Environmental Protection Agency (EPA) are responsible for making jurisdictional determinations and regulating wetlands and other waters under Section 404 of the CWA.

Wetland mitigation is out-of-kind and insufficient to compensate for impacts to stream functions. For unavoidable stream impacts, stream compensation is required under 33 CFR §332.3(e)(3); item 11.B.2. in Compensatory Mitigation for Losses of Aquatic Resources (73 Federal Register 19596, April 10, 2008); and the Galveston District Stream Condition Assessment Standard Operating Procedure for Compensatory Stream Mitigation.

Recommendation: TPWD recommends consulting with the USACE for potential impacts to waters of the U.S. including jurisdictional determinations, delineations, and mitigation.

Recommendation: TPWD recommends mitigation for all impacts to aquatic resources. The wetland and stream mitigation plan should be developed in consultation with TPWD. TREX should coordinate with Ms. Colleen Roco at (281) 534-0139 or Colleen.Roco@tpwd.texas.gov regarding aquatic habitat impacts and mitigation.

State Law: Parks and Wildlife Code – Chapter 64, Birds

Texas Parks and Wildlife (TPW) Code Section 64.002, regarding protection of nongame birds, provides that, “no person may . . . catch, kill, injure, pursue, or possess . . . a bird that is not a game bird.” TPW Code Section 64.003, regarding destroying nests or eggs, provides that, “[n]o person may destroy or take the nests, eggs, or young and any wild game bird, wild bird, or wild fowl” TPW Code Chapter 64 does not allow for incidental take and, therefore, is more restrictive than the MBTA.

Recommendation: Please review the *Federal Law: Migratory Bird Treaty Act* section above for recommendations as they are also applicable for Chapter 64 of the TPW Code compliance.

State Law: Aquatic Resources

TPW Code Section 1.011 provides TPWD authority to regulate and conserve aquatic animal life in public waters. Title 31, Chapter 57, Subchapter B, Section 57.157 of the Texas Administrative Code (TAC) regulates relocation of native fish, shellfish, freshwater mussels and clams, and plants in state waters, and Section 12.301 of the TPW Code identifies liability for wildlife taken in violation of TPW Code or a regulation adopted under TPW Code.

The Draft EA notes in MM-11, MM-12, MM-13, MM-14, and MM-16 that TREX makes several commitments related to aquatic habitats and/or water quality. These include:

- Use of erosion and sedimentation control measures along surface waters;
- Efforts towards the maintenance of natural water flow and drainage patterns;
- Minimization of impacts to waters and wetlands, and coordination/compliance with USACE regulatory requirements;

- Coordination/compliance with Texas Commission on Environmental Quality (TCEQ) regulatory requirements; and
- Staff/contractors will be properly trained in herbicide application, shall comply with product label directions, shall limit the amount of product entering waterways, and shall use only those products regulated for such uses by the EPA and follow all state regulations regarding their use.

Recommendation: To minimize disturbance to streams/wetlands and to minimize impacts to aquatic life, the applicant should only allow personnel and equipment to enter these areas when essential to the work being done. Only vegetation impeding construction should be removed, equipment should not be driven over vegetation when it is wet, and heavy machinery should not be stored on vegetative cover for long periods of time. Protective mats should be utilized during construction to reduce the amount of soil and root disturbance and aid in the recovery of plants.

Recommendation: To minimize potential impacts to sensitive organisms, the applicant should use BMPs for riparian and/or wetland areas. BMPs should include measures such as avoiding construction during spawning periods and use of double silt fences and doubling soil stabilization measures along the banks to avoid increasing the turbidity of the water.

Recommendation: For dewatering activities or other construction-related activities that may impact fish and wildlife resources, the applicant should coordinate with TPWD (Heather.Biggs@tpwd.texas.gov or 281-534-0133) regarding any required TPWD Aquatic Resource Relocation Plan (ARRP) and/or Aquatic Introduction Permit (AIP) prior to initiating any construction activities. The responsible party may be liable for replacement costs for fish and wildlife mortalities resulting from these types of activities (TPW Code 12.301). The process for determining the replacement value and cost of fish and wildlife resources can be found in §31 TAC 69.19-69.29.

Recommendation: Erosion and sedimentation control materials should adhere to the guidelines presented in the *General Construction Recommendations* section, above, and should be properly installed and maintained.

Recommendation: TREX should coordinate with Ms. Colleen Roco at (281) 534-0139 or Colleen.Roco@tpwd.texas.gov regarding aquatic habitat impacts and mitigation measures.

State Law: State-Listed Species

Section 68.015 of the Parks and Wildlife Code regulates state-listed species. Please note that there is no provision for capture, trap, take, or kill (incidental or otherwise) of state-listed species. A copy of *TPWD Protection of State-Listed Species Guidelines*, which includes a list of penalties for take of species, can be found online at the TPWD Wildlife Habitat Assessment Program: Laws and Regulations Applicable to TPWD Review

webpage. State-listed species may only be handled by persons with the appropriate authorization obtained through TPWD. For more information on this authorization, please contact the Wildlife Permits Office at (512) 389-4647.

The Draft EA does acknowledge potential habitat for multiple state-listed species as occurring within the project area. MM-20 includes commitments to notify TPWD or the U.S. Fish and Wildlife Service (USFWS) if any federally or state listed threatened or endangered species are encountered during construction.

TPWD provides online access to state-listed species information through the TPWD Rare, Threatened, and Endangered Species of Texas by County (RTEST) application. This application provides county-level information regarding occurrence of protected species (federal- or state-listed threatened or endangered) and may be utilized to inform development project planning. Additionally, records of occurrence for these protected species are tracked within the Texas Natural Diversity Database (TXNDD) and are publicly available by request. In reviewing these data sources, aerial imagery, and the Draft EA, TPWD has determined the project area appears to provide suitable habitat for multiple state-listed species, such as the following species (see aforementioned *Federal Law: Endangered Species Act* section for those species that are both federal- and state-listed):

- reddish egret (*Egretta rufescens*, threatened)
- white-faced ibis (*Plegadis chihi*, threatened)
- wood stork (*Mycteria americana*, threatened)

Birds

The reddish egret is a year-round resident within Texas, inhabiting marshes, shallow salt ponds, and tidal flats. The species may occur inland on rare occasions. Reddish egrets nest communally with other species of wading birds. Nests are constructed on the ground or in trees/bushes, often in the thickets of coastal islands.

The white-faced ibis inhabits marshes, swamps, ponds, and rivers. Freshwater systems are preferred. Isolated nesting colonies have been documented from Oregon to Kansas, but white-faced ibis are more commonly found in Utah, Texas, and Louisiana. In Texas, this species breeds and winters along the Gulf Coast; migrants may occur in the Texas panhandle and west Texas. The white-faced ibis is a colonial nesting species and will construct nests in beds of bulrushes, mats formed by dead vegetation, or trees. Nesting and hatching occurs in late spring through early summer.

The wood stork is associated with various habitats featuring shallow, standing water, such as prairie ponds, ditches, mudflats, flooded fields, and natural wetlands. This species will utilize both freshwater and saltwater systems, located in either open or forested areas. The wood stork roosts communally in snags, sometimes in association with other species of wading birds (e.g., herons).

Recommendation: TPWD recommends avoiding disturbance to habitats required by the above-listed birds. If disturbance of these habitats is anticipated, TREX should coordinate with TPWD to determine avoidance, minimization, and mitigation strategies.

Recommendation: Please review the *Federal Law: Migratory Bird Treaty Act* section above for recommendations as they are also applicable for minimizing impacts to state-listed bird species.

Rare Species

In addition to state- and federally-protected species, TPWD tracks special features, natural communities, and rare species that are not listed as threatened or endangered. These species and communities are tracked in the TXNDD, and TPWD actively promotes their conservation. TPWD considers it important to evaluate and, if necessary, minimize impacts to rare species and their habitat to reduce the likelihood of endangerment and preclude the need to list as threatened or endangered in the future.

A review of TXNDD information, RTEST, and recent aerial photographs indicates that suitable habitat may be present within the study area for the following rare species and that these species could potentially be impacted by project activities:

- brown pelican (*Pelecanus occidentalis*)
- Texas diamondback terrapin (*Malaclemys terrapin littoralis*)
- American eel (*Anguilla rostrata*)

Recommendation: TPWD recommends TREX assess the project area for suitable habitat for the above-listed rare species and avoid adverse impacts to them, if found. As the project advances, please review current TXNDD data and the TPWD RTEST online county list for Galveston County for rare species that may occur within the project area depending upon potential suitable habitat availability. If during construction, the project area is found to contain rare species, natural plant communities, or special features, TPWD recommends that precautions be taken to avoid impacts to them.

Recommendation: If encountered during construction, measures should be taken to avoid impacting any wildlife or rare plants.

Invasive Species

The Draft EA does not address invasive species or make commitments to implement BMPs aimed at their prevention or management. The proposed project area is susceptible to colonization by a variety of invasive species of plants. These plants often outcompete native plant species and establish monocultures, making the area less beneficial for wildlife and people and lowering aesthetic value of an invaded area. Invasive species of particular

concern are giant salvinia (*Salvinia molesta*), common water hyacinth (*Eichhornia crassipes*), alligatorweed (*Alternanthera philoxeroides*), deep-rooted sedge (*Cyperus entrerianus*), guineagrass (*Urochloa maxima*), Chinese tallow (*Triadica sebifera*), chinaberry (*Melia azedarach*), Brazilian peppertree (*Schinus terebinthifolius*), trifoliate orange (*Poncirus trifoliata*), salt cedar (*Tamarix ramosissima*), Chinese privet (*Ligustrum sinense*), Japanese honeysuckle (*Lonicera japonica*), and any non-native grass species.

Recommendation: TPWD recommends TREX establish sanitation procedures to prevent the spread of invasive plants. TPWD recommends such a plan include the following measures to minimize invasive plant spread: 1) Inspect the site for infestation prior to operations. 2) Avoid driving vehicles, mowers, all-terrain vehicles, or spray equipment through infestations in seed or fruit. 3) Brush and wipe all seeds and debris from clothes, boots, socks, and personal protective equipment. 4) Clean motorized equipment, especially the undercarriage and tire surfaces. 5) Cover loads or bag cut invasive plants before transport.

Recommendation: TPWD recommends TREX avoid utilizing invasive species in seed mixes or plantings for revegetation or soil stabilization purposes. More information and resources regarding revegetation and restoration with native plants may be found at TPWD's Wildlife Habitat Assessment Program: Planning Tools and Best Management Practices webpage and at the Pollinator Partnership Planting Guides webpage.

Data Reporting and the Texas Natural Diversity Database

As mentioned earlier in this letter, TPWD maintains records of occurrence for protected and rare species, or SGCN, within the TXNDD and these data are publicly available by request. The TXNDD is intended to assist users in avoiding harm to rare species or significant ecological features. The TXNDD is updated continuously, and relies partially on information submitted by private parties, such as developers or their consultants. Given the small proportion of public versus private land in Texas, the TXNDD does not include a representative inventory of rare resources in the state.

Although it is based on the best data available to TPWD regarding rare species, the data from the TXNDD do not provide a definitive statement as to the presence, absence, or condition of special species, natural communities, or other significant features within a project area. Determining the actual presence of a species in a given area depends on many variables including daily and seasonal activity cycles, environmental activity cues, preferred habitat, transiency, and population density (both wildlife and human). The absence of a species can be demonstrated only with great difficulty, and then only with repeated negative observations, taking into account all the variable factors contributing to the lack of detectable presence.

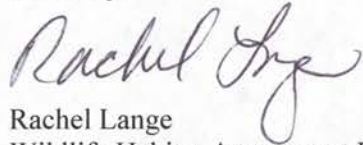
Please note that the absence of TXNDD information in an area does not imply that a species is absent from that area. These data are not inclusive and cannot be substituted for field surveys.

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Recommendation: To aid in the scientific knowledge of a species' status and current range, TPWD encourages reporting encounters of protected and rare species to the TXNDD according to the data submittal instructions found at the TPWD Texas Natural Diversity Database: Submit Data webpage.

Thank you for considering potential impacts to Texas' wildlife and natural resources during project planning. Please contact me at (361) 412-9012 or Rachel.Lange@tpwd.texas.gov if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Rachel Lange". The signature is written in dark ink and is positioned above the printed name and title.

Rachel Lange
Wildlife Habitat Assessment Program
Wildlife Division

RL:41530